REC'D TN RECIPATORY AUTH.

BellSouth Telecommunications, Inc.

615 214-6301 Fax 615 214-7406 Guy M. Hicks

Suite 2101

333 Commerce Street Nashville, Tennessee 37201-3300 AM 11 41 General Counsel

March 13, 1997 ... OF THE

EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

> BellSouth Telecommunications, Inc.'s Entry Into Long Distance Re: (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the responses of BellSouth Telecommunications, Inc. to the second set of data requests of MCI. A copy has been provided to counsel of record.

ery truly yours,

Gyy M. Hicks

GMH:ch

Enclosure

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REQUEST:

Does BellSouth use P/SIMS itself for internal uses? If so, for what purpose? Is this the primary such system that BellSouth uses for this purpose?

RESPONSE:

Yes. P/SIMS, or Products/Services Inventory Management System, is a database containing feature availability information based on the software and hardware capabilities of the central office switches. As office capacity allows and as system upgrades permit, features are activated in BellSouth switches, and the availability date is reflected in P/SIMS. P/SIMS allows the BellSouth representative to determine which features are available at the central office associated with the end user customer's telephone number.

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REQUEST:

In First Data Request No. 6 propounded on BellSouth on February 10, 1998, BellSouth was requested to provide certain network blockage data. BellSouth responded by providing blockage data above certain percentage cutoffs (2% or 3%). For each common trunk group utilized for CLEC traffic that experienced any blockage above 0%, please provide blockage data including the percentage of blockage that was experienced. Likewise, for each trunk group described in subparts a, b or c of First Data Request No. 6 that experienced any blockage above 0%, please provide blockage data including the percentage of blockage that was experienced.

RESPONSE:

BellSouth objects to this request on grounds that the information requested is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. In response to First Data Request No. 6, BellSouth furnished blocking data which establishes parity of service for BellSouth to CLEC traffic as compared to BellSouth to BellSouth traffic. The percentage cutoffs that BellSouth used in its response are standard industry parameters such as were approved for use in BellSouth's FCC Tariff No. 1, Section 6.5.7 Design Blocking Probability. Because simply engineering economics dictate that trunks experience some level of blockage, providing data reflecting any blockage above 0%, as this Request asks BellSouth to do, would be meaningless.

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 1998, a copy of the foregoing document was served on the parties of record, via facsimile or hand delivery addressed as follows:

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